

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**CHARLES BROWN, MARNIE BROWN,  
COURTNEY WELLS, AUSTIN WELLS, B.B.,  
a minor, by and through his mother and father  
and next friends, Charles Brown and Marnie Brown;  
and G.B., a minor, by and through his mother and  
father and next friends, Charles and Marnie Brown**

**PLAINTIFFS**

**v.**

**CIVIL ACTION NO. 3:14cv197DPJ-FKB**

**FORD MOTOR COMPANY , XYZ  
Corporations 1-10**

**DEFENDANTS**

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**FORD MOTOR COMPANY'S MOTION TO EXCLUDE  
THE OPINIONS OF STAN SMITH**

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For reasons set forth in its Memorandum Brief, Defendant Ford Motor Company moves this Court to Exclude the Opinions of Stan Smith. Ford relies on the following exhibits in support of its Motion:

- Exhibit A: Excerpts from Deposition of Dr. Stan Smith
- Exhibit B: Report of Dr. Stan Smith
- Exhibit C: August 12, 2013 Letter from Mississippi Board of Psychology to Dr. Smith
- Exhibit D: Report of Dr. Criss W. Lott
- Exhibit E: Charles Brown's PTSD Profile Report
- Exhibit F: Courtney Wells' PTSD Profile Report

This the 30<sup>th</sup> day of January, 2015.

Respectfully submitted

FORD MOTOR COMPANY

By Its Attorneys,

BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, PC

By: /s/ Sterling Kidd

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**CERTIFICATE OF SERVICE**

I, Sterling Kidd, do hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of the filing to all counsel who have registered with the system.

This 30<sup>th</sup> day of January, 2015.

/s/Sterling Kidd

D. Sterling Kidd